

STATE OF SOUTH CAROLINA

(Caption of Case)

Application of South Carolina Electric & Gas
Company for Increases and Adjustments in Electric
Rate Schedules and Tariffs

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET
NUMBER: 2009 - 489 - E

(Please type or print)

Submitted by: Tom Clements

SC Bar Number: _____

Address: 1112 Florence StreetTelephone: 803-834-3084Columbia, SC 29201

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Other: _____

Email: tomclements329@cs.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition☐ Request for item to be placed on Commission's Agenda expeditiously☐ Other: _____

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)			
<input checked="" type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request	
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification	
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation	
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement	
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment	
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter	
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response	
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery	
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input checked="" type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition	
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation	
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena	
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff	
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other: _____	
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest		
<input type="checkbox"/> Other: _____	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit		
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report		

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**STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION**

DOCKET NO. 2009-489-E

IN THE MATTER OF:

Application of South Carolina Electric & Gas,
Company for Increases and Adjustments in
Electric Rate Schedules and Tariffs

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**PETITION TO INTERVENE of
TOM CLEMENTS**

Tom Clements hereby petitions the Public Service Commission of South Carolina (Commission), pursuant to the South Carolina Code of Regulations, Chapter 103, and other applicable rules and regulations of the Commission for the permission to intervene in the above-captioned docket. In support of this petition, Mr. Clements submits the following:

1. I am an SCE&G rate payer who lives in Columbia, South Carolina and am thus directly impacted by any rate increase granted to the company in this docket as well as other associated actions taken by the company and the Commission.
2. As the Southeastern Nuclear Campaign Coordinator for Friends of the Earth, I work with SCE&G rate payers who are Friends of the Earth supporters impacted by any rate increases granted to the company in this docket. Given that I have a direct and material interest in the proceeding and that my interests are not adequately represented by other intervenors, I am compelled to hereby intervene.
3. Although formally representing only myself in the current proceedings, I have participated in various earlier proceedings before the Public Service Commission as a representative of Friends of the Earth, which has been a formal party to proceedings.
4. I am concerned about the impact of the current rate hike request and, due to the expansion of the rate base in the event any rate hike is approved, am also concerned about the impact of the current request on the amount of money collected from rate payers in the programmed rate hikes to finance the costly and risky Jenkinsville nuclear reactor project. In addition to the rate hike request in docket 2009-489-E, I am aware of the unknown costs of the SCE&G nuclear project and the fact that the Nuclear Regulatory Commission's review of the flawed and unlicensed AP1000 "shield building" remains on hold while Westinghouse works to redesign the shield building and develop tests in order to attempt to show that the building can survive earthquakes, tornadoes, hurricanes and airplane crashes. The connection between the current rate hike request and the financial impact to rate payers of rate hike requests for the nuclear project must be examined.

5. I am supportive of hearings to be held in various locations in which the general public can present their opinions or testimony about the current rate hike request, including its relevance to the cost of the SCE&G nuclear power project, and will encourage participation in those hearings in order that the Commission hear from a wider variety of public opinion. My participation in those public hearings would not allow adequate participation in the proceedings and I am thus filing this intervention.

While supportive of efforts to protect the environment, my position in the docket in relation to the current request is not fully developed. I request the right to question witnesses and present witnesses but at this time have not decided to present witnesses.

I believe that granting my request to be made a party of record in the above-captioned proceeding is in the public interest, is consistent with the policies of the Commission in encouraging maximum public participation in the issues before it, and should be allowed so that a full and complete record addressing my views and concerns can be developed.

I therefore request that this petition to intervene be granted by the Commission and that I be made a formal party of record to the proceeding and that I be allowed to participate fully in this proceeding and to take such positions as I deem advisable.

I hereby certify that I have mailed copies of this Petition to Intervene to all parties which have formally intervened in this docket and which are so listed on the docket website.

March 22, 2010

A handwritten signature in cursive script that reads "Tom Clements". The signature is written in dark ink and is positioned above a horizontal line.

Tom Clements
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